

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ALABAMA
EASTERN DIVISION**

IN RE:)	BANKRUPTCY CASE NO.:
)	
TINA D BAILEY,)	19-40065
)	
DEBTOR.)	(CHAPTER 11 CASE)
)	

MOTION TO CONTINUE
HEARING ON U.S. BANK TRUST NATIONAL ASSOCIATION'S
RENEWED MOTION FOR RELIEF FROM AUTOMATIC STAY

COMES now the Debtor-In-Possession, **TINA D BAILEY**, by and through her attorney, **HARRY P. LONG**, and hereby requests that this Honorable Court continue the hearing on the Renewed Motion for Relief from Automatic Stay (Doc. No. 164) filed by U.S. Bank Trust National Association, as Trustee of the Tiki Series IV Trust (hereinafter U.S. Bank) until the next available docket and as grounds therefore would show onto the Court as follows:


Mrs. Bailey's husband, William R. Bailey, who has assisted her and will have to continue to assist her in the effectuation of the Plan, is currently suffering from severe heart issues and he is now waiting to be scheduled for additional heart procedures (see Exhibit "A" attached hereto and incorporated herein by reference).

Mr. Bailey has been advised not to take on any undue stress until after the procedures and he is released by the doctor. The procedures have not been scheduled as of this moment but Mr. Bailey is awaiting the call from the doctor to schedule same.

The undersigned has consulted with the attorney for U.S. Bank and he has not consented to this Motion to Continue.

WHEREFORE, upon the above premises, the Debtor requests that this Honorable Court continue this matter until the next available docket, which the undersigned believes to be June 24, 2021.

DATED: This the 19th day of May, 2021.




Harry P. Long
Attorney for Debtor-In-Possession
Post Office Box 1468
Anniston, Alabama 36202
(256) 237-3266
hlonglegal8@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the following via electronic mail, on this the 19th day of May, 2021:

Robert J. Landry, III
Bankruptcy Administrator
Robert_Landry@alnb.uscourts.gov

Mark A. Baker
Attorney for U.S. Bank
mbaker@mtglaw.com



Harry P. Long

Exhibit "A"

10:23:15 a.m.

05-18-2021

2 / 2

**ARRHYTHMIA INSTITUTE**
AT GRANDVIEW

3686 Grandview Parkway, Suite 720 Birmingham, AL 35243-3407

Phone (205) 971-7566 Fax (205) 443-9363

May 18, 2021

RE: William Bailey

To Whom It May Concern:

William Bailey is currently undergoing evaluation for arrhythmias. He recently wore a cardiac monitor, and I am awaiting the results of this monitor. It would be prudent for Mr. Bailey to avoid any unnecessary stress until I can determine the actual cause of his arrhythmias and develop a treatment plan for him.

If you have any questions, please do not hesitate to call our office at (205)971-7500.

Sincerely,

Anil Rajendra, MD

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